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U.S. Bank National Association,  
As Trustee For MASTR Asset Backed  
Securities Trust 2006-WMC4, Mortgage  
Pass-Through Certificates, Series 2006-WMC4

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

U.S. BANK NATIONAL ASSOCIATION,  
AS TRUSTEE FOR MASTR ASSET  
BACKED SECURITIES TRUST 2006-  
WMC4, MORTGAGE PASS-THROUGH  
CERTIFICATES, SERIES 2006-WMC4,

Plaintiff,

v.

ER HOLDINGS NV LLC, a Nevada limited  
liability company; VILLA DEL ORO  
OWNERS ASSOCIATION, a Nevada non-  
profit corporation; LIDIA BOLOY  
HERRERA, an individual,

Defendants.

Case No.: 2:17-cv-02129-JAD-GWF

STIPULATION AND ~~PROPOSED~~  
ORDER TO STAY LITIGATION AND  
DISCOVERY PENDING  
COMPLETION OF SETTLEMENT

Pursuant to Local Rules LR IA 6-2 and LR 7-1, Plaintiff U.S. Bank National Association, as Trustee For MASTR Asset Backed Securities Trust 2006-WMC4, Mortgage Pass-Through Certificates, Series 2006-WMC4 ("U.S. Bank"), and Defendants ER Holdings

NV LLC (“ER Holdings”) and Villa Del Oro Owners Association (the “HOA”) (collectively, the “Parties”),<sup>1</sup> by and through their respective undersigned counsel, stipulate as follows:

1. The instant action was filed on August 8, 2017. [ECF No. 1.]

2. ER Holdings and the HOA filed a joint answer to the Complaint on October 2, 2017. [ECF No. 9.]

3. On November 20, 2017, the Court entered a Discovery Plan and Scheduling Order in this matter, which order set the deadline to complete discovery in this case for April 2, 2018. [ECF No. 11.] Around the same time, U.S. Bank and ER Holdings commenced settlement discussions which have been ongoing throughout this action. Accordingly, on February 28, 2018, the Court entered a Stipulation and Order Extending Discovery Deadlines (First Request), which extended the discovery deadline in this matter to July 2, 2018. [ECF No. 14.]

4. On June 11, 2018, U.S. Bank and ER Holdings came to an agreement with respect to this matter, and are in the process of finalizing their settlement.

5. Additionally, U.S. Bank and the HOA are discussing a possible resolution of this matter.

6. Given the pending settlement between U.S. Bank and ER Holdings, and the settlement discussions between U.S. Bank and the HOA, and to avoid wasting resources and incurring potentially unnecessary expense associated with completing discovery, the Parties agree to, and hereby request, a stay of this case to give U.S. Bank and ER Holdings sufficient time and resources to finalize their settlement, as well as to give U.S. Bank and the HOA time to attempt to reach a resolution as well.

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<sup>1</sup> Defendant Lidia Boloy Herrera has not appeared in this action.

7. The Parties make this stipulation in good faith and not for purposes of delay.

Dated this 19th day of June, 2018.

SMITH LARSEN & WIXOM

/s/Katie M. Weber

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Attorneys for Plaintiff

U.S. Bank National Association, As Trustee

For MASTR Asset Backed Securities Trust

2006-WMC4, Mortgage Pass-Through

Certificates, Series 2006-WMC4

Dated this 19th day of June, 2018.

HOA LAWYERS GROUP, LLC

/s/Steven T. Loizzi

Steven T. Loizzi, Jr., Esq.

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9500 W. Flamingo, Suite 204

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Attorney for Defendants

ER Holdings NV LLC and Villa Del Oro

Owners Association

IT IS SO ORDERED:

George Foley Jr.  
UNITED STATES MAGISTRATE JUDGE

DATED: 6/21/2018